

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
RS FIT NW LLC,)	
)	Case No. 20-11568 (KBO)
Debtor.)	
)	(Jointly Administered)
)	
<hr style="border: 0.5px solid black;"/>		
24 HOUR FITNESS WORLDWIDE, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
CONTINENTAL CASUALTY COMPANY;)	Adv. Pro. No. 20-51051 (KBO)
ENDURANCE AMERICAN SPECIALTY)	
INSURANCE COMPANY; STARR SURPLUS)	
LINES INSURANCE COMPANY; ALLIANZ)	
GLOBAL RISKS US INSURANCE COMPANY;)	
LIBERTY MUTUAL INSURANCE COMPANY;)	
BEAZLEY-LLOYD'S SYNDICATES 2623/623;)	
ALLIED WORLD NATIONAL ASSURANCE)	
COMPANY; QBE SPECIALTY INSURANCE)	
COMPANY; and GENERAL SECURITY)	
INDEMNITY COMPANY OF ARIZONA,)	
)	
Defendants.)	
)	
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**PROPERTY INSURER DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND
INCORPORATED MEMORANDUM OF LAW**

EXHIBIT A-25

*Email from Adam Vanderyacht to Jason Carter, Dan Larson
RE: Club Reopening Corp Procedure & Club Reopening Checklist
(Deposition of Dan Larson, Exhibit 7)
24HF_Production_0034026-24HF_Production_0034030*

Message

From: Adam Vanderyacht [avanderyacht@24hourfit.com]
Sent: 4/9/2020 9:09:21 PM
To: Jason Carter [jcarter@24hourfit.com]; Dan Larson [dlarson@24hourfit.com]
Subject: Club Reopening Corp Procedure & Club Reopening Checklist
Attachments: Fac Corp Reopen Procedure.docx; Reopen Checklist Protocol.docx

Hey Jason and Dan,

Attached are two documents I have put together based on the feedback from our calls, conversations with Dan, and working backward from our closure document.

The first, 'Fac Corp Reopen Procedure' outlines the plan of attack for reopening clubs in a market. This is a higher level summary of the tasks that will happen once a selection of sites is complete and we are ready to engage staff.

The second 'Reopen Checklist Protocol' is the document the LFT will use to check the club and confirm it is safe to continue with reopening.

This document does not address any specific social distancing procedures. This is designed to be the 'phase one' steps for getting staff back in a club so the social distance steps and appropriate signage can be posted.

Let me know if you have any questions, or see anything I missed.

Thanks!

Adam VanderYacht

Director – Facilities Operations
24 Hour Fitness USA, Inc.
925.543.3288 voice

Facilities Corporate Reopen Procedure

This process outlines the steps the Facilities Corporate team will take to ready the clubs for reopening following the COVID-19 shut down

Employee Onboarding Process

The following is the recommended cadence for bringing the Facilities team back from furlough

- 1 week before phase one planned reopening – Activate the remaining 11 furloughed LFTs for 8 hours per week to begin the Club Reopen Checklist process.
 - Note: May need to be extended if LFTs are asked to check cleaning chemical stock
- Clubs Reopening: The following is the suggested cadence for bringing back Facilities Technicians as clubs reopen.
 - 1 to 4 clubs in a district: Only the LFT will need to be activated. LFT is currently active for 8 hours per week to manage closed club safety checks. For each club that opens in a district, LFT should be activated for an additional 8 hours. Once 4 clubs are open in a district, LFT should be full time, supporting a club 4 days per week, and continuing stabilization 1 day per week.
 - 5 + clubs in a district: Once a district opens a 5th club, an FT should be activated (selected from the pool of FTs covering the clubs that have been opened). That FT will be expected to cover 2 clubs while the LFT will cover 3, and assist the FT in their 2 in addition to continued closed club stabilization. Continue to active 1 FT per 2 clubs from that point forward.
 - Note: As clubs reopen wet areas, an FT will need to be dedicated to that location full time, necessitating the need for an additional FT for each wet area we open.
- Reopening Checklist: The LFTs will focus on the following areas when reviewing the club for reopening. Additional specifications are included in the Club Reopening Checklist document.
 - Exterior of Club – Parking lot, walkways, building exteriors
 - Front Desk area – Lighting, computer equipment, and phone functionality
 - Cameras & Controls Systems – CCTV, water heaters, HVAC set points, lighting timers, fire panel
 - Workout Floor – Lighting, equipment function, free weight area arrangement
 - Locker Room Function – Lighting, sinks, toilets, urinals, hand & hair dryers, showers
 - Locker Room Conditions – Cracked, damaged, or stained tile
 - GroupX Studios – Lighting, flooring, sound system, GX equipment
 - Basketball & Raquetball Courts – Lighting, flooring, HVAC returns, sound system (where available)
 - Supplies – FT maintenance supplies, janitorial cleaning supplies
 - Kids Club – Amenity remains closed. Check for safety concerns only
 - Rooftop – HVAC units, exhaust fans, clean & clear, identify leaks
 - Wet area – Continue closed amenity stabilization

Club Reopening Checklist

The District LFT is tasked with completing this checklist. The following will be performed 1-2 weeks before reopening the club to confirm conditions are safe and ready for reopening.

☐ **Exterior of Club – Check for the following issues**

- ☐ Fallen trees or large branches
- ☐ Overgrown landscaping
- ☐ Extensive damage to parking lot surfaces that could result in a safety hazard
- ☐ Damage to sidewalks or walkways
- ☐ Broken, cracked, or vandalized windows
- ☐ Damaged or unlocked doors
- ☐ Damage or vandalism to the building

☐ **Front Desk, Sales & Entry Area – Check for the following conditions**

- ☐ Area is well lit
- ☐ Computers turn on properly
- ☐ Phones are working

☐ **Cameras & Controls Systems**

- ☐ Cameras – Make sure security camera system is functioning.
- ☐ Water Heaters – Return water heater set points to standard levels.
- ☐ HVAC Settings – HVAC units should be returned to standard occupied settings
 - EnTouch/Site Controls – Make sure the system controllers on the wall are functioning
 - Manual Thermostats – Adjust set points locally to standard heating and cooling setpoints.
- ☐ Lighting Controls & Timers – Make sure timers or controls for exterior lights are set correctly.
- ☐ Fire Panel – Check the fire panel for faults

☐ **Workout Floor – Check for the following conditions**

- ☐ Area is well lit
- ☐ Exercise equipment is functional
 - Note: If any equipment is out of order, determine if it can be removed from the workout floor
- ☐ Weights, plates, accessories, and bars are properly stored on racks/trees

☐ **Locker Room Function – Check for the following**

- ☐ Turn on any lights that had been switched off
- ☐ Check the following items to make sure they are working
 - Sinks
 - Toilets/urinals
 - Showers
 - Hand/hair dryers

☐ **Locker Room Conditions – Check for the following**

- ☐ Cracked tile
- ☐ Missing grout
- ☐ Stained tile or grout

Note: If these conditions exist, take a photo of the area and reach out to Facilities leadership for next steps

☐ **GroupX Studios – Check for the following**

- ☐ Turn on lights & make sure the area is well lit
- ☐ Make sure there are no floor issues causing trip or slip hazards
- ☐ Turn on the GX stereo and make sure it is working
- ☐ Make sure headsets are in place and batteries are available
- ☐ Make sure GroupX equipment sets are stocked and ready for classes
- ☐ Spin Studios – Space out the bikes by using one of the following options:
 - Preferred – Remove ½ of the bikes from the studio and store them off the floor
 - Alternate (If storage is not available) – Position bikes so equipment can be tagged out of service to create space

☐ **Basketball & Racquetball Courts – Check for the following**

- ☐ Turn on lights & make sure the area is well lit
- ☐ Make sure there are no floor issues causing trip or slip hazards
- ☐ Clean HVAC transfer grills, supply vents, and return grills removing any dust or cobwebs
- ☐ If a basketball GX system is in the club, check to make sure it is working

Note: The amenities will be reopened for individual member workouts, Personal Training, and scheduled GroupX classes. Do not worry about checking basketball hoops, balls, backboards, or padding.

☐ **Supplies – Check for the following**

- ☐ Check the FT shop to make sure there is stock of basic repair supplies
- ☐ Check the janitors closet/room for appropriate cleaning supplies using the list provided

☐ **Kids Club – This amenity is remaining closed until further notice. Check for the following**

- ☐ Leaks, damage, or other unsafe conditions

☐ **Rooftop/HVAC Systems – Check for the following**

- ☐ Make sure all HVAC units are powered on
- ☐ Make sure all exhaust fans are functioning properly with tightened belts and good airflow
- ☐ Clean up any debris or trash on the rooftop
- ☐ Sweep any standing water toward the roof drain
- ☐ Check for any roof penetrations or damage to the roof surface

Note: Document any HVAC or rooftop issues via email to HVAC@24hourfit.com for review.

Wet Area Amenities

All wet areas (pool, spa, steam room, sauna) will remain closed until further notice. Continue to perform the wet area closed club stabilization checks as outlined below:

Pool & Spa Check-in Visits

- ☐ Turn the pumps and chemical feeders on. Ensure proper priming and flow rates.

Note: Consult your RMF if you have questions regarding pump prime and flow rates

- ☐ Feed chemicals as needed to return chemistry to the following levels
 - ☐ Chlorine 10-15ppm
 - ☐ Acid alkalinity between 80-120ppm
 - ☐ pH 7.2 to 7.4
- ☐ Leave systems circulating for a minimum of 20 minutes.
- ☐ Basic vacuum and scrub of the pool and spa as needed for calcium build up or filter particulates.
- ☐ If chemicals need to be ordered, contact your RMF
- ☐ Shut systems down following stabilization

Sauna & Steam Room Closure

- ☐ **Sauna:** Confirm sauna heater is OFF. Prop open the door to air out room.
- ☐ **Steam Room:** Confirm the steam generator is OFF. Prop open the door to air out room.